

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

V .

Docket NO. 13-cr-40028-TSH

CYNTHIA MANSFIELD

**ASSENTED-TO MOTION TO MODIFY CONDITIONS OF
CONFINEMENT AT RESIDENTIAL REENTRY CENTER**

NOW COMES undersigned counsel, counsel for the defendant Cynthia Mansfield, and moves that this Honorable Court to allow Ms. Mansfield to be released from confinement at the residential reentry center for three nights on those occasions when she must undergo electro convulsive therapy ("ECT"). As reason therefore, undersigned counsel states that:

1. On April 15, 2015, this court sentenced Ms. Mansfield to 11 months of confinement at a Residential Reentry Center.
2. This Court authorized the probation department to allow Ms. Mansfield to leave this center for two nights on those occasions when she was to undergo ECT treatments. Two nights were required because Ms. Mansfield is confined in Boston and the treatments occur early in the morning in Worcester. She is picked up in Boston the night before a treatment and then spends the night following the treatment recovering at her sister's home.
3. These treatments are debilitating and render Ms. Mansfield unable to care for herself. She spends the time after treatment sleeping and recovering.

4. On occasion, these treatments are so debilitating that Ms. Mansfield remains unable to walk on the day following the treatment.
5. Ms. Mansfield recently underwent a treatment and was unable to walk on the day she was required to return to the McGrath House. As a result she had to be assisted up the stairs and into her room at the McGrath House. This was an extremely painful experience for Ms. Mansfield.
6. Ms. Mansfield is asking this Court to authorize three nights away from the McGrath House when she is undergoing these treatments so she can recover in her sister's home. This would include one night before each treatment and two nights after each treatment.
7. Ms. Mansfield is supervised by probation office Tim King and he does not oppose this change.
8. The Assistant U.S. Attorney who prosecuted this case is Scott Mansfield and he assents to this motion.

Cynthia Mansfield,

By her attorney,

/s/ Brian Murphy

Brian Murphy (666238)
Murphy & Vander Salm LLP
46 Wachusett Street
Worcester, MA 01609
murphy@mvsllp.com
Phone-508-425-6330
Fax- 508-536-0834

Dated: May 21, 2015

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF)

/s/ Brian Murphy

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